Koncept International, Inc. FCC Compliance Report

- **E911 Solution:**

Description of Service. The Koncept solution to provide users with E9-1-1 services includes alterations to our InfiNET Softswitch platform to collect user location information, a computer interface via API to Telefinity Dash911/ Intrado (Intrado) and the routing of end user dialed 911 calls to the Intrado routing system.

Our service is not intended as a replacement for basic telephone service, and as such the vast majorities of the subscribers on Koncept service provider networks uses the service as "long distance cost reduction" and still use a PSTN telephone connection as their primary line. These customers (over 99%) use the service to get better international long distance rates or to get "free" calling to other subscribers on the Koncept network. Less than 1% has a 10 digit NANP-PSTN "Virtual Number" (VN). Therefore, since the technology allows us to provide 911 services to those with a VN we will require them to have E911 services in order to maintain their VN. When the implementation is complete the service companies will set a deadline for subscribers to submit their initial location information in order to maintain service on their VN.

Implementation will begin once testing of the service with Intrado has been concluded, which is estimated to be Dec. 2, 2005. Since the majority of our service providers operate on our first generation H.323 system, they will be migrated to our SIP based InfiNET Softswitch VoIP Platform. They will then migrate all of their subscribers with VN numbers to move to the new platform, and complete their location information prior to a deadline set by the service company. This is estimated to be completed by 12/31/05. All current and future subscribers wishing to purchase a VN or those wishing to have 911 service will either be migrated to the new platform, or in the case of new subscribers have the new accounts on the new platform.

The users who possess a 10 Digit NANP-PSTN VN will be required to supply a physical location address in order to enable their VN. This information will be part of the ordering process for the VN as well as required to "re-enable" an existing VN. This information will be transmitted to the Intrado service where the address will be verified and stored in the ALI for the user's 10 digit Virtual Number. Confirmation of the address will allow for the enabling of the VN.

Once this is achieved, the user will be informed via email that they can now dial 911 for access to emergency services. When the user dials 911, the call is routed to Intrado service along with the 10 digit ANI, which is used as a trigger for the Intrado service. The users may change their location information either through their account web interface, via calling the call center, where operators will take the information, or through an IVR system. The Call Center and IVR are operated by Telefinity Dash911, and can be access by their NetPhones on a 7x24 basis.

The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 in cooperation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning

Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911 thereby enabling VoIP Service Providers (VSP) to take advantage of a full end-to-end solution from one E911 service provider.

The only VSP requirements for delivery of the V9-1-1 service are the ongoing delivery of address and telephone number information to Intrado via a real-time interface and the PSTN connectivity to the Telefinity Dash911/Intrado network to enable live 9-1-1 call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to its VSP customers.

- **911 Routing Information/Connectivity to Wireline E911 Network**:

  Currently through the assistance of our Network providers, each of Telefinity Dash911/Intrado's VSP customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Intrado that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

- **Transmission of ANI and Registered Location Information:**

  In order to trigger the Intrado services to route the call to the selective routers, the Koncept InfiNET Softswitch Platform transmits the 10 digit ANI number to the Intrado routes taken by a 911 call. In the case of those subscribers with 911 services the system will not allow the user to change their ANI or to block it. The number sent will be the Virtual Number attached to the Intrado account with the subscriber's physical location information attached.

  - **Basic PSAP:** Currently 93% of the US population is served by PSAP's operating off an E9-1-1 Selective Router. To illustrate PSAP's within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery.

  - **ANI Only:** There are unique deployment circumstances in areas of the US and Puerto Rico that operates off E9-1-1 Selective Routers, but will not meet the full FCC mandate. Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only

provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

New Jersey - In the State of New Jersey Intrado has obtained permission from the State to deploy a voice-only service which includes the call-taker receiving ANI on the VoIP 911 caller. The State ALI system is not capable of full dynamic ALI updates and will require an upgrade. New Jersey represents 3% of the total US population.

Ohio - To date, Ohio has not granted permission to Intrado to deploy a voice-only solution. The State ALI system is not capable of full dynamic ALI update. Ohio represents 4% of the total US population.

Hawaii - To date, Hawaii has not granted Intrado permission to deploy a voice-only solution. The ALI systems serving Hawaii are not capable of full dynamic ALI update. Hawaii represents 5% of the total US population

Puerto Rico - To date, Puerto Rico has not granted permission to Intrado to deploy a voice-only solution. The ALI systems are not capable of full dynamic ALI update. Puerto Rico represents 3% of the total US population

- **911 Coverage**:

- **Deployment Overview** – The Telefinity Dash 911 E911 solution uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached *"Major Market Deployment Map"*, which corresponds with MSA's, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911/Intrado has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

- **Obtaining Initial Registered Location Information:**

At time of the service commencement, subscribers will be required to provide their physical location via their "MyAccount" website. This information will be transmitted immediately to Telefinity Dash911/Intrado via a SOAP API computer link. The address will be verified and once confirmed the subscriber will be informed via email. Their Virtual Number service will then be enabled. Subscribers who supply the information prior to the cut off deadline will not see an interruption in their "inbound" service. Outbound service will not be interrupted as it

is the subscriber's discretion to participate. However the Virtual Number service will carry a mandatory participation in 911 services for U.S. based Virtual Numbers.

- **Obtaining Updated Registered Location Information**:

On an ongoing basis Koncept Service Providers' subscribers may update their physical location information through their 'MyAccount' website, with an email confirmation from Koncept. They may also, using their NetPhone call either a call center with live operators or an IVR service. All of these services are available on a 7x24 basis. The Call Center and IVR are operated by Telefinity Dash 911.

Telefinity Dash 911/Intyrado, as part of our total 9-1-1 solution, provides at least one way of updating each subscriber's Registered Location. As a component of the Telefinity Dash911/Intrado Service we have access to a near real-time address update system provided to us by Telefinity Dash911/Intrado. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street Address Guide in order to immediately determine if the submitted address is a valid address. VSP's may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscribers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

Telefinity Dash 911 also offers to us, as a VSP a newly-released product called "Level of Service (LoS) Query" that we can choose to integrate into our application. This functionality enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

As a VSP using Telefinity Dash911/Intrado's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Internet at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognize the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, is actively working a number of "location determination" technologies.